

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

NEIL STEVENS, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

RUST-OLEUM CORPORATION,

Defendant.

Case No.

**DECLARATION OF NEIL STEVENS
PURSUANT TO CALIFORNIA CIVIL CODE § 1780(d)**

I, NEIL STEVENS, declare as follows:

1. I have personal knowledge of the facts stated herein and, if called upon to do so, could competently testify thereto.
2. I am a Plaintiff in the above-captioned action.
3. I submit this declaration in support of the Class Action Complaint, which is based in part on violations of the Consumers Legal Remedies Act, California Civil Code section 1750 *et seq.*
4. The Class Action Complaint has been filed in the proper place for trial of this action.
5. Defendant Rust-Oleum Corporation is authorized to do business, has principal offices and headquarters located in, and is conducting substantial business in Illinois; Defendant has specifically marketed and sold its products in Illinois; Defendant's marketing decisions and marketing, and other decision-making with respect to the products at issue in this litigation, emanate from its headquarters in Illinois; Defendant has sufficient minimum contacts with the state of Illinois; and/or Defendant sufficiently avails itself of the markets of Illinois, through the promotion, sales, and marketing of its products in Illinois.

I declare under penalty of perjury under the laws of the United States and the State of California this 5th day of November in Clovis, California that the foregoing is true and correct.



Neil Stevens